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December 17, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Gary R. Brown, U.S.D.J.
100 Federal Plaza
Courtroom 840
Central Islip, NY 11722-9014

Re: Chacon v. Amity Car Wash, Inc., et ano.
Case No.: 2:21-cv-6201 (GRB) (ST)
MLLG File No.: 169-2021

Dear Judge Brown:

This office was recently retained as counsel to Defendants in the above-referenced case. Defendants write to respectfully request an extension of time until February 4, 2022 to respond to the complaint. Pursuant to Rule I of this Court's Individual Practice Rules, Defendants respectfully submit that this request is made at least forty-eight (48) hours in advance of the current deadline to respond to the complaint, and that the parties have met and conferred telephonically upon which Plaintiff consented to the requested extension of time.

The reason for this request is that this office was only recently retained and your undersigned counsel needs additional time to investigate the allegations in the complaint, prepare an appropriate response to same, and explore an early resolution with Plaintiff. To that end, the parties jointly request that this case be referred to mediation. Accordingly, Defendants respectfully submit that they have established sufficient good cause for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(B)(1)(A). Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
December 17, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

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